Domtar Industries Inc.)	Department
Washington County)	Findings of Fact and Order
Baileyville Maine)	Part 70 Air Emission License
A-215-70-H-A)	Amendment #5

After review of the Part 70 License Administrative Revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	Domtar Industries Inc., Woodland Mill
LICENSE NUMBER	A-215-70-A-I
LICENSE TYPE	Administrative Revision
NAICS CODES	32211, 32212
NATURE OF BUSINESS	Pulp and Paper
FACILITY LOCATION	Baileyville, Maine
DATE OF LICENSE ISSUANCE	December 22, 2004
LICENSE EXPIRATION DATE	December 22, 2009

B. Description of Revision

Domtar is currently operating the #9 Power Boiler with several State-Only requirements in Air Emission License A-215-70-A-I that specify various maintenance procedures Domtar must complete to ensure the efficient operation of #9 Power Boiler. These requirements are listed in Conditions 14 (H) through 14 (P). Due to improvements made in the boiler, the control systems, and the operation practices of #9 Power Boiler since this License was signed, Domtar has requested that Conditions 14(H) through 14(P) be simplified into one condition for greater ease in documenting and reporting maintenance procedures. Conditions 14(H) through 14(P) shall be removed and replaced with the following:

14(H) Domtar shall keep records of all maintenance performed on #9 Power Boiler including, but not limited to, inspections and maintenance on the grates, oil guns, and the combustion control systems. Copies of these records shall be submitted to the Department upon request. **Enforceable by State-only**

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The Conditions that currently follow 14(P) shall remain unchanged but shall be renumbered to correctly follow the new Condition 14(H).

C. Application Classification

The application for Domtar does not violate any applicable federal or state requirements. This license amendment is considered to be an Administrative Revision of a Part 70 source issued under Section 7 of Chapter 140 of the Department's regulations for a Part 70 source.

ORDER

The Department hereby grants Part 70 Administrative Revision A-215-70-H-A, subject to the conditions found in Part 70 License A-215-70-A-I, and in the following conditions:

<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

The following new Condition 14(H) shall replace current Conditions 14(H) through 14(P) in Air Emission License A-215-70-A-I:

14(H) Domtar shall keep records of all maintenance performed on #9 Power Boiler including, but not limited to, inspections and maintenance on the grates, oil guns, and the combustion control systems. Copies of these records shall be submitted to the Department upon request. **Enforceable by State-only**

Conditions 14(Q) through 14(V) shall be renumbered as follows:

(14) #9 Power Boiler

- I. An annual detailed review of scrubber operation shall be conducted by an original equipment manufacturer (OEM) representative, or otherwise qualified personnel. Any recommendations that arise shall be reviewed and acted upon as practicable. **Enforceable by State-only**
- J. Records of scrubber review and all repairs shall be maintained, available upon request, and included in Domtar's quarterly reports for the quarter when the annual review is conducted. **Enforceable by State-only**

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- K. Domtar shall operate, calibrate, and maintain NO_X, SO₂, and O₂ CEMS and a stack flow monitor in accordance with 40 CFR, Part 60, Appendix B and the data recovery requirements of MEDEP Chapter 117.
- L. The NO_X and SO₂ CEMS shall record data on a lb/hr basis. Domtar shall also record, on a daily basis, the total NO_X emissions in lb/day from the #9 power boiler, and on a monthly basis, the total NO_X emissions on a 12 month rolling total from the #9 power boiler. These emission rates shall be used to calculate the total NO_X emissions for Condition 17. [#A-215-71-B-A/R]
- M. Domtar may demonstrate compliance with NO_X emission limits using an emissions averaging basis, with CEM data. The emissions averaging shall be calculated between the #9 Power Boiler and #3 Recovery Boiler on an equivalent lb/MMBtu or ppmv on a 24-hour daily block arithmetic basis. The emission averaging basis shall be calculated as follows:
 - Calculate the surplus NOx from #3 Recovery Boiler by subtracting the # 3 Recovery Boiler actual NOx ppmdv corrected for O2 from Chapter 138 limit (164 ppm, dry basis corrected for O2);
 - Convert surplus NOx from #3 Recovery Boiler from ppmv to lbs/hr;
 - Convert surplus NOx from #3 Recovery Boiler from lbs/hr to lbs/MMBtu;
 - Subtract surplus NOx from #3 Recovery Boiler (in lbs/MMBtu) from actual 24 hour average (lb/MMBtu) on #9 Power Boiler and compare this value with NOx RACT lb/MMBtu limit (0.4 lbs/MMBtu) to determine compliance.

This method can also be used if surplus NOx from #9 Power Boiler needs to be averaged with NOx emissions from #3 Recovery Boiler.

If a CEM is used to demonstrate compliance with NO_X emission limits, then periods of startup, shutdown, malfunction, and fuel switching are not included in the 24-hour average emission rates, provided that records are maintained to show facility was operated to minimize emissions. [Chapter 138 Sec 3(O); #A-215-71-S-A]

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N. Until the CMS for Subpart DDDDD is installed, operational and data verified pursuant to 40 CFR, Part 63.8(c)(3), periodic monitoring for the #9 Power Boiler shall consist of the following:				
Periodic monitoring	Record	Average		
Scrubber pressure drop	Every 15 min	3 hr avg every three hours		
Scrubber media make- flow rate	up Every 15 min	3 hr avg every three hours		
Scrubber media recyc flow rate	cle Every 15 min	3 hr avg every three hours		
DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2007. DEPARTMENT OF ENVIRONMENTAL PROTECTION				
BY:				
The term of this amendment shall be concurrent with the term of Air Emission License A-215-70-A-I.				
PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES				
Date of initial receipt of application: 4/23/2007 Date of application acceptance: 5/9/2007 Date filed with the Board of Environmental Protection:				
Date free with the Dourd of Environmental Flotection.				

This Order prepared by Jonathan Voisine, Bureau of Air Quality.